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Attorneys for Defendant Barrick Goldstrike Mines, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TOMAS PEREZ,

Plaintiff,

v.

BARRICK GOLDSTRIKE MINES, INC., a
foreign corporation,

Defendant.

CASE NO. 3:19-cv-00067-RCJ-WGC

**STIPULATED MOTION TO EXTEND
JOINT PRE-TRIAL ORDER DEADLINE
(SECOND REQUEST)**

Pursuant to LR 26-3 and LR IA6-1, Defendant Barrick Goldstrike Mines, Inc. (“Barrick”) and Plaintiff Tomas Perez (“Perez”) move the Court for a stipulated extension to the current March 21 deadline (ECF No. 44) to file the Joint Pretrial Order required by LR 16-3. The parties

1 request until April 15, 2022, to submit the Joint Pretrial Order. This is the second requested
2 extension concerning the Joint Pretrial Order. The prior extension was requested to allow the
3 parties to conduct a settlement conference, which was ultimately unsuccessful (*see* ECF Nos. 41
4 & 44). As explained below, there is good cause for the request. The current request is necessary,
5 among other reasons, to allow Plaintiff's counsel time to care for his ailing mother, who was
6 recently transferred to a hospice facility.
7

8 According to ECF No. 44, the Parties Joint Pretrial Order is currently due on March 21,
9 2022, which is 45 days after the February 3, 2022, Settlement Conference. *See* ECF Nos. 44, 45,
10 & 48. Consistent with the obligations under the local rule, in a conversation during the week of
11 February 14, 2022, Plaintiff's counsel affirmed to Barrick's counsel that he would provide to
12 Barrick a draft pretrial order. Barrick's counsel followed up concerning the pretrial order via
13 email on March 3, 2022, and March 10, 2022. On March 11, Perez's counsel responded via
14 email, explaining that "we may need an additional couple of weeks." In addition to unplanned
15 work issues and a planned anniversary vacation, Perez's counsel explained that "I just learned
16 that my mother has been placed in hospice . . . I anticipate that I will be on bereavement leave for
17 a period when I get back." Barrick and Mr. Perez agree that an extension is appropriate in these
18 circumstances.
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21 Due to these unplanned circumstances, as well as the fact that this extension request is the
22 first since settlement negotiations took place, good cause exists to grant the requested extension.
23 The parties respectfully request until April 15, 2022, to file their Joint Pretrial Order.
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1 DATED this 14th day of March, 2022.

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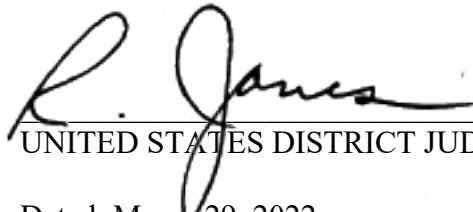
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IT IS SO ORDERED:

22 
23 UNITED STATES DISTRICT JUDGE
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25 Dated: March 29, 2022